

Amendments to the Drawings:

Please substitute the replacement drawing sheets attached hereto and containing Figures 1-17 for the original drawing sheets containing Figures 1-17.

Attachment: Sixteen sheets of drawings

REMARKS

I. INTRODUCTION

Claims 1-33 are presently pending in this application. Applicants respectfully request reconsideration of the application in view of the following arguments.

II. AMENDMENTS TO THE DRAWINGS

Applicant has submitted sixteen sheets of replacement drawings. These sheets of drawings generally do not involve substantive changes, but rather relate to the replacement of the informal drawings originally filed with the application with formal drawings conforming to the requirements of 37 C.F.R. §§ 1.84 and 1.121(d). Applicants submit that the amendments does not add any new matter.

III. REJECTION OF CLAIMS 1-2, 20 AND 29-30 UNDER 35 U.S.C. § 103(A)

Claims 1-2, 20 and 29-30 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328). Applicants respectfully submit that the rejection of claims 1-2, 20 and 29-30 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

“Patent examiners carry the responsibility of making sure that the standard of patentability enunciated by the Supreme Court and by the Congress is applied in each and every case.” MPEP § 2141 (emphasis in original).

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations.

MPEP § 2143. Applicants submit that the combination of Utsugi et al., Reichwein et al. and Williams et al. does not disclose or suggest all of the limitations set forth in the claims. Further, Applicants submit that there is no suggestion or motivation to combine the teachings of Utsugi et al., Reichwein et al. and Williams et al.

Independent claim 1 recites:

1. A system for processing applications from customers for manufacture of vehicle parts by a manufacturer, comprising:
a first server configured to generate an application interface on a customer client in communication with said first server through a first network and to receive a first completed application for manufacture of a first part of a vehicle from said customer through said customer client using said application interface, said first completed application having information including a first set of information regarding operating conditions of said vehicle, a second set of information defining specifications for said first part, and a third set of information regarding a second part of said vehicle functionally interrelated with said first part of said vehicle.

Applicants respectfully submit that the combination of Utsugi et al., Reichwein et al., and Williams et al. does not disclose a system meeting the above-recited limitations.

Utsugi et al. discloses an order processing system. The Examiner asserts that the system includes a server that generates an application interface on a customer client and that receives a completed application for manufacture of a first part that includes a set of

information relating to a second part functionally interrelated with the first part. Office Action p. 2. Applicants respectfully submit, however, that Utsugi does not expressly or inherently disclose a client-server architecture as recited in independent claim 1. Utsugi et al. discloses a system in which communications between an orderer 3 and an order processor 11 occur over an "International Network System" which appears to be an internal communications network. Communications between the order processor 11 and the manufacturer are described as occurring over a WAN (wide area network). Figure 2. Utsugi et al., however, does not disclose the nature of either network. The Examiner simply concludes that "WAN is a network of computers that covers a large geographical distance, thus indicating use of servers." Office Action p. 2. Applicants respectfully submit, however, that the communication networks disclosed in Utsugi et al. could just as easily be peer to peer networks or another network configuration in which no servers are required. Accordingly, Utsugi et al. do not expressly or inherently disclose a client-server architecture. Applicants further note, for example, that Utsugi et al. states that the communications network between the orderer 3 and order processor 11 (i.e., the one that supposedly directly generates the application interface and receives the completed application) could comprise a facsimile or telephone system. Utsugi et al, para. [0069]. Again, Applicants therefore submit that Utsugi et al. does not expressly or inherently disclose a client-server architecture as recited in claim 1.

Applicants further submit that Utsugi et al. does not disclose or suggest that the completed application includes "third set of information regarding a second part of said vehicle functionally interrelated with said first part of said vehicle." The Examiner cites paragraph [0135] in Utsugi et al. as disclosing a system meeting this limitation.

Applicants submit, however, that paragraph [0135] at most discloses that the system performs processing operations to group ordered parts. The cited paragraph does not disclose or suggest that the orderer 3 would be providing any information on functionally related parts. For example, it is certainly possible that the orderer 3 simply places an order for a product and that the Utsugi system responds by obtaining and grouping the parts for that product. Contrary to the Examiner's assertion, there is simply no disclosure or suggestion in the cited paragraph regarding the information provided by the orderer 3.

Applicants further submit that there is no suggestion or motivation to combine the teachings of Bury et al. and Reichwein et al. with Utsugi et al. In particular, both Bury et al. and Reichwein et al. comprise non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicants' claimed invention relates to ordering of vehicle parts for manufacture. Reichwein et al. is directed to a system for servicing vehicles and other equipment in which a portion of the system enables transmission of data relating to vehicle operating conditions over a network to a service center. The system in Reichwein et al. has nothing to do with parts manufacturing and the information transmitted in the claimed system and in the system of Reichwein et al. would be entirely different. Further, Reichwein et al. is not reasonably pertinent to the problem with which applicants were concerned. Applicants claimed invention is directed to improving efficiency in requests for manufacture of parts.

Reichwein et al. is directed towards improved coordination of equipment service operations. Applicants note in this regard that the Examiner's stated motivation for combining the teachings of Reichwein et al. with Utsugi et al. (i.e. "it would help in defining the operating parameters of the equipment and allow a service technician to duplicate the symptoms as well as the operating conditions that cause the symptom to aid in the repair" Office Action p. 3) has nothing whatsoever to do with the ordering of manufactured parts as claimed by Applicants nor with the ordering system provided by Utsugi et al. The system in Utsugi et al. has absolutely nothing to do with servicing parts. Accordingly, Applicants respectfully submit that one of ordinary skill in the art would have no motivation to modify Utsugi et al. based on the teachings of Reichwein et al. as suggested by the Examiner.

Bury et al. is also not within the field of the invention. As opposed to the orders for manufacture of parts, Bury et al. is directed to a system for estimating manufacturing costs for parts. Bury et al. is also not reasonably pertinent to the problem with which Applicants were concerned. While Applicants' invention is directed towards improved efficiency in orders for manufacture of vehicle parts, Bury et al. is directed towards providing cost and weight estimates for manufactured parts without requiring in-depth knowledge of the manufacturing process for the part. See [0006]. Applicants also note that the Examiner's stated motivation for combining the teachings of Bury et al. with Utsugi et al. (i.e. "information about the parts specification would allow to quickly cross reference between parts thereby helping the user to accurately access information about authentic parts" Office Action p 3) has nothing do with Bury et al. and was blocked copied from the prior Office Action dealing with a different reference. Accordingly,

Applicants respectfully submit that one of ordinary skill in the art would have no motivation to modify Utsugi et al. based on the teachings of Bury et al. as suggested by the Examiner.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited independent claim 1 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claim 1 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicants request that the rejection of claims 1 under 35 U.S.C. § 103(a) be withdrawn. Further, at least because each of claims 2, 20 and 29-30 depend from independent claim 1, Applicants submit that the rejection of claims 2, 20 and 29-30 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants further submit that claims 2, 20 and 29-30 recite patentable subject matter apart from their dependence on claim 1. In particular, the references identified by the Examiner fail to disclose or suggest many of the limitations set forth in the claims.

Claim 2 recites “a second server in communication with said first server over one of said first network and a second network; and, a database that stores said information, said database accessible by said second server.” As set forth above, Utsugi et al. does not expressly or inherently disclose a client-server system—much less a system meeting the particular requirements of the claim. Further, the database identified by the Examiner does not store information regarding orders for manufacture of parts as recited in claim 1. Instead the database stores information relating “supply capacity data of a plurality of associates that supply parts”. See paragraph [0045]. In other words, the database identified by the Examiner in Utsugi et al. stores information relating to each supplier’s

ability to fill orders—not information relating to orders for manufacture of parts as recited in the claim.

Claim 29 further recites “a manufacturer client in communication with said first server over one of said first network and a second network.” Again, Utsugi et al. does not expressly or inherently disclose a client-server architecture in contrast to the Examiner’s statements.

IV. REJECTION OF CLAIM 3 UNDER 35 U.S.C. § 103(A)

Claim 3 stands rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Giles (U.S. Published Application No. 2005-0138216). Applicants respectfully submit that the rejection of claim 3 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claim 3, as amended, depends directly from claim 2 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1-2. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 2. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 3 depends from claims 1 and 2, Applicants submit that the rejection of claim 3 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

V. REJECTION OF CLAIMS 10-16 AND 26 UNDER 35 U.S.C. § 103(A)

Claims 10-16 and 26 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Shields et al. (U.S. Published Application No. 2004-0030614). Applicants respectfully submit that the rejection of claims 10-16 and 26 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 10-16 and 26 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 10-16 and 26 depends from claim 1, Applicants submit that the rejection of claims 10-16 and 26 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that claims 10-16 and 26 recite patentable subject matter apart from their dependence on claim 1. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in many of the claims.

Claim 11 depends from claim 10. Claim 10 recites that the "application interface includes a plurality of tabs.. each tab of said plurality of tabs corresponding to a category

of requested information. Claim 11 further recites the limitation “wherein said plurality of tabs are displayed in a plurality of rows, each row of said plurality of rows containing at least two tabs of said plurality of tabs.” The Examiner asserts that Shields et al. disclose a system meeting the limitations recited in claim 11 citing paragraph [0018] and [0020] in Shields et al. The paragraphs in Shields et al. cited by the Examiner, however, simply state that the information can be displayed in one or more tabs. There is absolutely no disclosure that the tabs are displayed “in a plurality of rows” nor that “each row of said plurality of rows contain[s] at least two tabs of said plurality of tabs.” Applicants again note that even a cursory review of Figures 2 and 4 (which show tabs in a single row) in Shields et al. demonstrates that Shields et al. do not disclose or suggest a system meeting this limitation.

Claim 12 also depends from claim 10 and further recites “wherein each category of said plurality of categories of requested information includes at least one field and said first server is further configured to generate a notification to said customer when said customer selects a new category of requested information and a value in a field of a previously selected category of requested information fails to meet a predetermined condition.” The Examiner cites paragraph [0115] in Shields et al. as disclosing a system meeting this limitation. Applicants first note that there is no disclosure in Shields et al. regarding the input of information comprising the order or requisition. Rather, Shields et al. describes a system that organizes pre-existing requisition orders for review by buyers. Accordingly, Shields et al. does not even disclose or suggest the system by which the requisitioner (who is analogous to the customer in the claimed invention) places the order. Further, the paragraph cited by the Examiner does not disclose a system for

further contact with the requisitioner. Accordingly, Shields et al. does not disclose a server "configured to generate a notification to said customer" much less generation of the notice responsive to the specific events recited in claim 12.

Claim 13 is also dependent on claim 10 and recites "wherein each category of said plurality of categories of requested information includes at least one field and said first server is further configured to generate a first value for a first field responsive to receipt of a second value for a second field from said customer client." Again, Shields et al. does not even disclose the system by which the requisitioner places an order (it simply discloses a system for organizing and displaying multiple orders). Accordingly, Shields et al. certainly do not disclose or suggest the specific system recited in claim 13 in which values in fields are automatically generated responsive to input values in other fields nor the more specific limitations of claims 14-15.

Claim 26 further recites "wherein said first server is further configured to transmit an approval notification to said customer upon review of said first completed application by an approval agent of said manufacturer." The Examiner cites paragraph [0054] of Shields et al. as disclosing a system meeting this limitation. The cited paragraph, however, describes information disclosed to a company buyer reviewing requisition orders placed by a requisitioner. The paragraph does not describe transmission of information to the requisitioner (the person analogous to the customer in the claims).

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in the claims and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 10-16 and 26 under 35 U.S.C. § 103(a) is improper.

Accordingly, Applicants request that the rejection of claims 10-16 and 26 under 35 U.S.C. § 103(a) be withdrawn.

VI. REJECTION OF CLAIMS 17-19 UNDER 35 U.S.C. § 103(A)

Claims 17-19 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Tanner et al. (U.S. Published Application No. 2004-0243588). Applicants respectfully submit that the rejection of claims 17-19 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references:

Claims 17-19 depend directly from claim 10 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1 and 10. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1 and 10. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 17-19 depend from claims 1 and 10, Applicants submit that the rejection of claims 17-19 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that claims 17-19 recite patentable subject matter apart from their dependence on claims 1 and 10. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in the claims and again represents non-analogous art.

Claim 17 recites “wherein said application interface includes an indicator indicating, simultaneously for each of said plurality of categories of requested information, whether said first server has received all requested information in said category of requested information.” The Examiner cites paragraph [0310] in Tanner et al. as disclosing a system meeting this limitation. The cited paragraph, however, refers to status indicators for use by “alerters” and “supervisors” in reviewing search results obtained in response to a customer inquiry. The status indicator is not, conversely, indicative of whether the categories of information requested from the *customer* or applicant have been received in the application interface as required by the claim. Further, Tanner et al. do not disclose or suggest an indicator having “a plurality of members corresponding to said plurality of tabs, said plurality of members ordered in the same manner as said plurality of tabs” as recited in claim 19. Tanner et al. does not disclose any correlation between the status indicators and user input tabs.

There is also no suggestion or motivation to combine the teachings of Tanner et al. with the other references. First, Tanner et al. is non-analogous art. Tanner et al. relates to a system for administering a database and is unrelated to the receipt of orders for manufacture of vehicle parts. Tanner et al. is also not pertinent to the problems that Applicants were concerned with. Tanner et al. is directed towards improved correlation of search requests and results by removing false positives from the search results, a problem far removed from improving efficiency in orders for manufacture of parts. Second, the Examiner’s stated motivation to “provide a user or operator with the ability to readily recognize, organize, or otherwise group together particular inquiry requests or records based on their respective status condition” is unrelated to the claimed invention

which deals with the completion of information submitted for a single inquiry or request from the customer.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited claims 17-19 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 17-19 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicants request that the rejection of claims 17-19 under 35 U.S.C. § 103(a) be withdrawn.

VII. REJECTION OF CLAIMS 21-25 AND 31-33 UNDER 35 U.S.C. § 103(A)

Claims 21-25 and 31-33 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Olson et al. (U.S. Published Application No. 2003-0004825). Applicants respectfully submit that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 21-25 and 31-33 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. Claims 31-33 also depend from claim 29 and therefore incorporate all of the limitations set forth in claim 29. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 29. Applicants

also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 21-25 and 31-33 depend from claim 1 (and because claims 31-33 depend from claim 29), Applicants submit that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that claims 21-25 and 31-33 recite patentable subject matter apart from their dependence on claims 1 and 29. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in the claims.

Claim 21 recites “wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, an electronic link to a prior application of said customer.” Claim 23 depends from claim 21 and further recites “wherein said prior application comprises an incomplete application.” The examiner cites paragraph [0067] in Olson et al. as disclosing a system meeting the limitation of claim 23. The cited paragraph, however, deals with notification and correction of errors during data entry. The cited paragraph does not relate in any way to incomplete applications as recited in the claim and the information is again provided automatically to the user rather than at user request.

Claim 25 depends from claim 21 and further recites “wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, electronic links to prior applications of said customer and to order said electronic links in accordance with one of a plurality of criteria selected by said customer through said customer client.” The Examiner cites paragraphs [0070] and [0080] in Olson et al. as disclosing a system meeting this limitation. To the extent it can

even be said that these paragraphs in Olson et al. discloses a system that produces electronic links to prior applications, there is simply no disclosure or suggestion of ordering of any links—much less ordering based on customer criteria as recited in the claim.

Claims 31-33 all relate to notifications (and ordering of notifications) sent to a manufacturer client after an application has been completed (see claim 30 from which claims 31-33 depend) The Examiner cites paragraphs [0061], [0067], [0070], and [0080] in Olson as meeting these limitations. The cited paragraphs, however, relate to links or messages sent to customer users as opposed to manufacturers as required by the claim language. Further, there is simply no disclosure or suggestion of a method of ordering multiple messages as recited in claim 33.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited claims 21-25 and 31-33 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicants request that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) be withdrawn.

VIII. REJECTION OF CLAIMS 27-28 UNDER 35 U.S.C. § 103(A)

Claims 27-28 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Shields (U.S. Published Application No. 2004-0030614) and further in view of Olson et al. (U.S. Published

Application No. 2003-0004825). Applicants respectfully submit that the rejection of claims 27-28 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 27-28 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. Claim 27 also depends from claim 26 and therefore incorporate all of the limitations set forth in claim 26. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 26. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 27-28 depend from claim 1 (and because claim 27 depends from claim 26), Applicants submit that the rejection of claims 27-28 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that at least claim 28 recites patentable subject matter apart from their dependence on claim 1. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in the claims.

Claim 28 recites "wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, electronic links to a subset of prior applications of said customer, said subset created responsive to search data provided by said customer." The Examiner has identified paragraph [0080] in Olson et al. as disclosing a system meeting the recited limitation. Paragraph [0080], however, only discloses the automated transmission of messages "pushed" to users. The

cited paragraph does not disclose or suggest transmission of information response to user requests, much less a subset of prior applications of the customer or a creation of a subset responsive to search data provided by the user. There is simply no disclosure or suggestion of these features whatsoever in the cited paragraph.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited claims 27-28 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 27-28 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicants request that the rejection of claims 27-28 under 35 U.S.C. § 103(a) be withdrawn.

IX. REJECTION OF CLAIMS 8-9 UNDER 35 U.S.C. § 103(A)

Claims 8-9 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Brickell et al. (U.S. Published Application No. 2003-0115142). Applicants respectfully submit that the rejection of claims 8-9 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 8-9 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicants also submit that there is no suggestion or

motivation to combine the teachings of the references cited by the Examiner.

Accordingly, at least because claims 8-9 depend from claim 1, Applicants submit that the rejection of claims 8-9 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that claims 8-9 recite patentable subject matter apart from their dependence on claim 1. In particular, Applicants submit that there is no suggestion or motivation to combine the teachings of Brickell et al. with the other references because Brickell et al. is again non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention. Brickell et al. is again outside the field of invention and not pertinent to the problem with which Applicants were concerned. Brickell et al. relates to the field of system user authentication rather than the receipt of manufacturing orders for vehicle parts. Further, Brickell et al. is directed towards solving the problem of developing a flexible security system for new technologies rather than efficient handling of orders for manufacture of parts. See Brickell et al. para. [0005].

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited claims 8-9 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 8-9 under 35 U.S.C. § 103(a) is improper.

Accordingly, Applicants request that the rejection of claims 8-9 under 35 U.S.C. § 103(a) be withdrawn.

X. REJECTION OF CLAIMS 4-5 AND 7 UNDER 35 U.S.C. § 103(A)

Claims 4-5 and 7 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Schuyler et al. (U.S. Patent No. 6,832,202). Applicants respectfully submit that the rejection of claims 4-5 and 7 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 4-5 and 7 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 4-5 and 7 depend from claim 1, Applicants submit that the rejection of claims 4-5 and 7 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

XI. REJECTION OF CLAIM 6 UNDER 35 U.S.C. § 103(A)

Claim 6 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Schuyler et al. (U.S. Patent No. 6,832,202) and further in view of Haines et al. (U.S. Published Application

No. 2002-0072998). Applicants respectfully submit that the rejection of claim 6 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claim 6 depends from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner.

Accordingly, at least because claim 6 depends from claim 1, Applicants submit that the rejection of claim 6 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants also submit, however, that claim 6 recites patentable subject matter apart from its dependence on claim 1. In particular, Applicants submit that the cited references fail to disclose or suggest all of the limitations of claim 6 and that there is no suggestion or motivation to combine the teachings of Haines et al. with the other references because Haines et al. is again non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

Claim 6 recites "wherein said application notification includes an electronic link to said first completed application." The Examiner cites paragraph [0089] in Haines et al. as disclosing a system meeting this limitation. Applicants respectfully submit that the cited paragraph does not disclose the claimed system. The claimed system refers to an "application notification" sent to an "approval agent" (see claim 4) for the application


after completion of the application by the customer. In the embodiment of the invention recited in claim 6, this “application notification” includes a link to the application completed by the customer. The cited paragraph in Haines et al. discloses a completely different concept. The cited paragraph describes emails that are sent from a seller of consumables *to* a customer and that contains links to websites enabling orders of the consumables *by the customer*. The claimed invention and the cited paragraph in Haines et al. therefore describe completely different concepts.

Haines et al. is also non-analogous art because it is again outside the field of Applicants’ invention and not pertinent to the problem with which Applicants were concerned. Haines et al. relates to ordering of pre-manufactured “consumables” rather than the applications for manufacture of vehicle parts. Haines et al., para. [0002]. Further, Haines et al. is directed towards solving the problem of automating consumables ordering rather than efficient handling of orders for manufacture of parts. See Haines et al. para. [0006].

XII. CONCLUSION

For the above cited reasons, all of the claims presently pending in this application are believed to be allowable. If the Examiner has any further questions or concerns, the Examiner is invited to contact the Applicant's undersigned attorney.

Respectfully submitted,



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